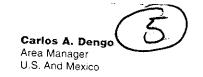
ExxonMobil Exploration Company Post Office Box 4778

Houston, Texas 77210-4778



RULES PROCESSING TEAM

OCT 1 6 2000

EXonMobil Exploration

October 12, 2000

Department of Interior Minerals Management Service Mail Stop 4024 381 Elden Street Herndon, Virginia 20170-4817

Attention: Rules Processing Team

ExxonMobil Exploration Company appreciates this opportunity to offer comments on the Plain-Language Revision of Existing Rules for Joint Bidding Restrictions.

ExxonMobil Exploration Company believes that clarification of 30CFR Part 260.303 (d) is necessary in order to reflect accurately the intent of the regulation. This redrafted provision of former Part 260.303 (c) purports to prohibit an agreement that would result /in two or more restricted joint bidders acquiring or holding an interest in the tract for which the bid is being submitted. We believe the intent of the regulation is to prohibit restricted joint bidders from entering into prior agreements covering open (unleased) tracts that are being bid. Such intent is consistent with the effect contemplated in its predecessor regulation. We are concerned, however, that the redrafted provision could be misinterpreted in support of an argument that it prohibits even subsequent agreements (such as AMIs) covering a tract after such tract has been properly bid and We seek clarification that the regulation does not prohibit subsequent agreements (such as subsequent AMIs) covering a tract after such tract has been properly leased.

Thank you for your consideration.

Conho / Dego

Very truly yours,

JointBiddingRest. CAD/TEA:mp